

2020R00129/RF

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

FILED

MAK 11 2022

UNITED STATES OF AMERICA

Hon. Brian R. Martinotti

v.

Crim. No. 21-838 (BRM)

AT 8:30 ^{4:15} P.M.
WILLIAM T. WALSH
CLERK

JAKAI DENNIS,

a/k/a "Bop,"

ANGEL KEARNEY,

a/k/a "Jim,"

a/k/a "Dred,"

THOMAS GIBSON,

a/k/a "Tommy,"

JAMAR HALL,

a/k/a "Goo,"

KEVIN HALL,

KASIM THURSTON,

a/k/a "KAI,"

a/k/a "KAZ,"

IBN THURSTON,

a/k/a "Wheezy,"

a/k/a "Saheed,"

SHALAMAR McCALL,

a/k/a "Shaggy,"

HAKIS MOSES,

a/k/a "Hak," and

JALEEL DRAKE,

a/k/a "Lil,"

a/k/a "SK"

21 U.S.C. § 846

21 U.S.C. §§ 841(a)(1), (b)(1)(C)

18 U.S.C. § 924(c)(1)(A)(i)

18 U.S.C. § 922(g)(1)

SECOND SUPERSEDING INDICTMENT

The Grand Jury in and for the District of New Jersey, sitting at Newark,
charges:

COUNT ONE

(Conspiracy to Distribute and Possess with Intent to Distribute Heroin,
Fentanyl, and Cocaine Base)

1. From at least as early as in or around July 2020 through in or
around June 2021, in the District of New Jersey and elsewhere, the
defendants,

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**JAKAI DENNIS,
a/k/a “Bop,”
ANGEL KEARNEY,
a/k/a “Jim,”
a/k/a “Dred,”
THOMAS GIBSON,
a/k/a “Tommy,”
JAMAR HALL,
a/k/a “Goo,”
KEVIN HALL,
KASIM THURSTON,
a/k/a “KAI,”
a/k/a “KAZ,”
IBN THURSTON,
a/k/a “Wheezy,”
a/k/a “Saheed,”
SHALAMAR McCALL,
a/k/a “Shaggy,”
HAKIS MOSES,
a/k/a “Hak,” and
JALEEL DRAKE,
a/k/a “Lil,”
a/k/a “SK,”**

did knowingly and intentionally conspire and agree with one another and with others to distribute and to possess with intent to distribute one kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, 400 grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, and 280 grams or more of a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

MANNER AND MEANS

2. It was part of the conspiracy that Jakai Dennis, Angel Kearney, Thomas Gibson, Jamar Hall, Kevin Hall, Kasim Thurston, Ibn Thurston,

Shalamar McCall, Hakis Moses, and Jaleel Drake (“the Fairmount co-conspirators”) obtained heroin, fentanyl, and cocaine base (“crack cocaine”) from various sources.

3. It was further a part of the conspiracy that the Fairmount co-conspirators would store heroin, fentanyl, and crack cocaine inside apartments located at a residential building on Fairmount Avenue (the “Fairmount Avenue Residential Building”).

4. It was further a part of the conspiracy that the Fairmount co-conspirators would distribute heroin, fentanyl, and crack cocaine in and around the Fairmount Avenue Residential Building.

5. It was further a part of the conspiracy that the Fairmount co-conspirators would work different “shifts” during which they would distribute heroin, fentanyl, and crack cocaine in and around the Fairmount Avenue Residential Building.

6. It was further a part of the conspiracy that the Fairmount co-conspirators possessed, stored, and used firearms and ammunition to protect the distribution of heroin, fentanyl, and crack cocaine in and around the Fairmount Avenue Residential Building.

7. It was further a part of the conspiracy that the Fairmount co-conspirators communicated using telephones to discuss drug distribution and other business related to the distribution of heroin, fentanyl, and crack cocaine in and around the Fairmount Avenue Residential Building.

In violation of Title 21, United States Code, Section 846.

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COUNT TWO

(Distribution and Possession with Intent to Distribute Heroin and Fentanyl)

On or about July 21, 2020, in the District of New Jersey and elsewhere,
the defendant,

**HAKIS MOSES,
a/k/a “Hak,”**

did knowingly and intentionally distribute and possess with intent to distribute
a mixture and substance containing a detectable amount of heroin, a Schedule
I controlled substance, and fentanyl, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and
(b)(1)(C).

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COUNT THREE

(Distribution and Possession with Intent to Distribute Heroin, Fentanyl, and Cocaine Base)

On or about July 28, 2020, in the District of New Jersey and elsewhere,
the defendant,

**JAKAI DENNIS,
a/k/a “Bop,”**

did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance, and a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT FOUR

(Distribution and Possession with Intent to Distribute Heroin, Fentanyl, and Cocaine Base)

On or about October 8, 2020, in the District of New Jersey and elsewhere, the defendant,

KEVIN HALL,

did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance, and a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT FIVE

(Distribution and Possession with Intent to Distribute Heroin and Fentanyl)

On or about October 28, 2020, in the District of New Jersey and elsewhere, the defendant,

**HAKIS MOSES,
a/k/a “Hak,”**

did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

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COUNT SIX

(Distribution and Possession with Intent to Distribute Heroin and Fentanyl)

On or about November 3, 2020, in the District of New Jersey and elsewhere, the defendant,

JALEEL DRAKE,
a/k/a "Lil,"
a/k/a "SK,"

did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

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COUNT SEVEN

(Distribution and Possession with Intent to Distribute Heroin, Fentanyl, and Cocaine Base)

On or about November 9, 2020, in the District of New Jersey and elsewhere, the defendant,

**HAKIS MOSES,
a/k/a “Hak,”**

did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance, and a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

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COUNT EIGHT

(Distribution and Possession with Intent to Distribute Heroin and Fentanyl)

On or about December 1, 2020, in the District of New Jersey and elsewhere, the defendant,

**THOMAS GIBSON,
a/k/a “Tommy,”**

did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

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COUNT NINE

(Distribution and Possession with Intent to Distribute Heroin and Fentanyl)

On or about December 3, 2020, in the District of New Jersey and elsewhere, the defendant,

**JALEEL DRAKE,
a/k/a "Lil,"
a/k/a "SK,"**

did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

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COUNT TEN

(Distribution and Possession with Intent to Distribute Heroin and Fentanyl)

On or about December 8, 2020, in the District of New Jersey and elsewhere, the defendant,

**IBN THURSTON,
a/k/a “Wheezy,”
a/k/a “Saheed,”**

did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

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COUNT ELEVEN

(Distribution and Possession with Intent to Distribute Heroin, Fentanyl, and Cocaine Base)

On or about December 8, 2020, in the District of New Jersey and elsewhere, the defendant,

KEVIN HALL,

did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance, and a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

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COUNT TWELVE

(Distribution and Possession with Intent to Distribute Heroin, Fentanyl, and Cocaine Base)

On or about January 7, 2021, in the District of New Jersey and elsewhere, the defendant,

**SHALAMAR MCCALL,
a/k/a “Shaggy,”**

did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance, and a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT THIRTEEN

(Distribution and Possession with Intent to Distribute Heroin, Fentanyl, and Cocaine Base)

On or about January 12, 2021, in the District of New Jersey and elsewhere, the defendant,

**SHALAMAR MCCALL,
a/k/a “Shaggy,”**

did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance, and a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

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COUNT FOURTEEN

(Distribution and Possession with Intent to Distribute Heroin and Fentanyl)

On or about February 10, 2021, in the District of New Jersey and elsewhere, the defendant,

**KASIM THURSTON,
a/k/a “Kai,”
a/k/a “Kaz,”**

did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

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COUNT FIFTEEN

(Distribution and Possession with Intent to Distribute Heroin, Fentanyl, and Cocaine Base)

On or about February 23, 2021, in the District of New Jersey and elsewhere, the defendant,

**JAKAI DENNIS,
a/k/a “Bop,”**

did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance, and a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT SIXTEEN

(Distribution and Possession with Intent to Distribute Heroin and Fentanyl)

On or about February 25, 2021, in the District of New Jersey and elsewhere, the defendant,

**THOMAS GIBSON,
a/k/a “Tommy,”**

did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT SEVENTEEN

(Distribution and Possession with Intent to Distribute Heroin, Fentanyl, and Cocaine Base)

On or about March 1, 2021, in the District of New Jersey and elsewhere,
the defendant,

**JAKAI DENNIS,
a/k/a “Bop,”**

did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance, and a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

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COUNT EIGHTEEN

(Distribution and Possession with Intent to Distribute Heroin, Fentanyl, and Cocaine Base)

On or about March 6, 2021, in the District of New Jersey and elsewhere,
the defendant,

**JAKAI DENNIS,
a/k/a “Bop,”**

did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance, and a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

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COUNT NINETEEN

(Distribution and Possession with Intent to Distribute Heroin, Fentanyl, and Cocaine Base)

On or about March 17, 2021, in the District of New Jersey and elsewhere, the defendant,

**KASIM THURSTON,
a/k/a “Kai,”
a/k/a “Kaz,”**

did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance, and a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

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COUNT TWENTY

(Distribution and Possession with Intent to Distribute Heroin, Fentanyl, and Cocaine Base)

On or about March 19, 2021, in the District of New Jersey and elsewhere, the defendant,

**JAMAR HALL,
a/k/a “Goo,”**

did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance, and a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

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COUNT TWENTY-ONE

(Distribution and Possession with Intent to Distribute Heroin and Fentanyl)

On or about March 22, 2021, in the District of New Jersey and elsewhere, the defendant,

**JAKAI DENNIS,
a/k/a Bop,”**

did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

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COUNT TWENTY-TWO

(Possession of Ammunition by a Convicted Felon)

On or about March 26, 2021, in Essex County, in the District of New Jersey and elsewhere, the defendant,

**KASIM THURSTON,
a/k/a “Kai,”
a/k/a “Kaz,”**

knowing that he had previously been convicted of at least one crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting interstate commerce at least nine (9) rounds of .40 caliber ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT TWENTY-THREE

(Distribution and Possession with Intent to Distribute Heroin and Fentanyl)

On or about April 13, 2021, in the District of New Jersey and elsewhere,
the defendant,

**THOMAS GIBSON,
a/k/a “Tommy,”**

did knowingly and intentionally distribute and possess with intent to distribute
a mixture and substance containing a detectable amount of heroin, a Schedule
I controlled substance, and fentanyl, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and
(b)(1)(C).

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COUNT TWENTY-FOUR

(Distribution and Possession with Intent to Distribute Heroin and Fentanyl)

On or about April 20, 2021, in the District of New Jersey and elsewhere,
the defendant,

**THOMAS GIBSON,
a/k/a “Tommy,”**

did knowingly and intentionally distribute and possess with intent to distribute
a mixture and substance containing a detectable amount of heroin, a Schedule
I controlled substance, and fentanyl, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and
(b)(1)(C).

COUNT TWENTY-FIVE

(Distribution and Possession with Intent to Distribute Heroin and Fentanyl)

On or about April 27, 2021, in the District of New Jersey and elsewhere,
the defendant,

**THOMAS GIBSON,
a/k/a “Tommy,”**

did knowingly and intentionally distribute and possess with intent to distribute
a mixture and substance containing a detectable amount of heroin, a Schedule
I controlled substance, and fentanyl, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and
(b)(1)(C).

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COUNT TWENTY-SIX

(Distribution and Possession with Intent to Distribute Heroin and Fentanyl)

On or about May 4, 2021, in the District of New Jersey and elsewhere,
the defendants,

**ANGEL KEARNEY,
a/k/a “Jim,”
a/k/a “Dred,” and
JAMAR HALL,
a/k/a “Goo,”**

did knowingly and intentionally distribute and possess with intent to distribute
a mixture and substance containing a detectable amount of heroin, a Schedule
I controlled substance, and fentanyl, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and
(b)(1)(C).

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COUNT TWENTY-SEVEN

(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

On or about May 4, 2021, in Essex County, in the District of New Jersey and elsewhere, the defendant,

**JAMAR HALL,
a/k/a “Goo,”**

in furtherance of a drug trafficking crime for which the defendant may be prosecuted in a court of the United States, namely, distribution and possession with intent to distribute heroin and fentanyl charged in Count Twenty-Six of this Second Superseding Indictment, did knowingly possess a firearm—namely, a loaded 9mm Taurus handgun, bearing serial number TCO28853.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

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COUNT TWENTY-EIGHT

(Possession of a Firearm and Ammunition by a Convicted Felon)

On or about May 4, 2021, in Essex County, in the District of New Jersey and elsewhere, the defendant,

**JAMAR HALL,
a/k/a “Goo,”**

knowing that he had previously been convicted of at least one crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting interstate commerce a 9mm Taurus handgun, bearing serial number TCO28853, and 17 rounds of 9mm ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

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COUNT TWENTY-NINE

(Distribution and Possession with Intent to Distribute Heroin and Fentanyl)

On or about May 8, 2021, in the District of New Jersey and elsewhere,
the defendant,

KEVIN HALL,

did knowingly and intentionally distribute and possess with intent to distribute
a mixture and substance containing a detectable amount of heroin, a Schedule
I controlled substance, and fentanyl, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and
(b)(1)(C).

COUNT THIRTY

(Distribution and Possession with Intent to Distribute Heroin and Fentanyl)

On or about May 12, 2021, in the District of New Jersey and elsewhere,
the defendant,

**JAMAR HALL,
a/k/a "Goo,"**

did knowingly and intentionally distribute and possess with intent to distribute
a mixture and substance containing a detectable amount of heroin, a Schedule
I controlled substance, and fentanyl, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and
(b)(1)(C).

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COUNT THIRTY-ONE

(Distribution and Possession with Intent to Distribute Cocaine Base)

On or about May 13, 2021, in the District of New Jersey and elsewhere,
the defendant,

**JAKAI DENNIS,
a/k/a “Bop,”**

did knowingly and intentionally distribute and possess with intent to distribute
a mixture and substance containing a detectable amount of cocaine base, a
Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and
(b)(1)(C).

COUNT THIRTY-TWO

(Possession of Firearms in Furtherance of a Drug Trafficking Crime)

On or about May 13, 2021, in Essex County, in the District of New Jersey and elsewhere, the defendant,

**JAKAI DENNIS,
a/k/a “Bop,”**

in furtherance of a drug trafficking crime for which the defendant may be prosecuted in a court of the United States, namely, distribution and possession with intent to distribute cocaine base charged in Count Thirty-One of this Second Superseding Indictment, did knowingly possess firearms—namely, a loaded .45 caliber handgun, bearing serial number G1128413, and a loaded 9mm handgun, bearing serial number F12502.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

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COUNT THIRTY-THREE

(Possession of Firearms and Ammunition by a Convicted Felon)

On or about May 13, 2021, in Essex County, in the District of New Jersey and elsewhere, the defendant,

**JAKAI DENNIS,
a/k/a “Bop,”**

knowing that he had previously been convicted of at least one crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting interstate commerce one loaded .45 caliber handgun, bearing serial number GI128413; and one loaded 9mm handgun, bearing serial number F12502.

In violation of Title 18, United States Code, Section 922(g)(1).

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COUNT THIRTY-FOUR

(Distribution and Possession with Intent to Distribute Heroin and Fentanyl)

On or about May 19, 2021, in the District of New Jersey and elsewhere,
the defendant,

**ANGEL KEARNEY,
a/k/a "Jim,"
a/k/a "Dred,"**

did knowingly and intentionally distribute and possess with intent to distribute
a mixture and substance containing a detectable amount of heroin, a Schedule
I controlled substance, and fentanyl, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and
(b)(1)(C).

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COUNT THIRTY-FIVE

(Distribution and Possession with Intent to Distribute Heroin and Fentanyl)

On or about May 26, 2021, in the District of New Jersey and elsewhere,
the defendant,

**ANGEL KEARNEY,
a/k/a “Jim,”
a/k/a “Dred,”**

did knowingly and intentionally distribute and possess with intent to distribute
a mixture and substance containing a detectable amount of heroin, a Schedule
I controlled substance, and fentanyl, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and
(b)(1)(C).

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COUNT THIRTY-SIX

(Distribution and Possession with Intent to Distribute Heroin and Fentanyl)

On or about May 25, 2021, in the District of New Jersey and elsewhere,
the defendant,

**JALEEL DRAKE,
a/k/a "Lil,"
a/k/a "SK,"**

did knowingly and intentionally distribute and possess with intent to distribute
a mixture and substance containing a detectable amount of heroin, a Schedule
I controlled substance, and fentanyl, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and
(b)(1)(C).

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COUNT THIRTY-SEVEN

(Distribution and Possession with Intent to Distribute Heroin and Fentanyl)

On or about May 30, 2021, in the District of New Jersey and elsewhere,
the defendant,

KEVIN HALL,

did knowingly and intentionally distribute and possess with intent to distribute
a mixture and substance containing a detectable amount of heroin, a Schedule
I controlled substance, and fentanyl, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and
(b)(1)(C).

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COUNT THIRTY-EIGHT

(Distribution and Possession with Intent to Distribute Heroin and Fentanyl)

On or about June 3, 2021, in the District of New Jersey and elsewhere,
the defendant,

**ANGEL KEARNEY,
a/k/a “Jim,”
a/k/a “Dred,”**

did knowingly and intentionally distribute and possess with intent to distribute
a mixture and substance containing a detectable amount of heroin, a Schedule
I controlled substance, and fentanyl, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and
(b)(1)(C).

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COUNT THIRTY-NINE

(Distribution and Possession with Intent to Distribute Cocaine Base)

On or about June 14, 2021, in the District of New Jersey and elsewhere,
the defendant,

**JAKAI DENNIS,
a/k/a "Bop,"**

did knowingly and intentionally distribute and possess with intent to distribute
a mixture and substance containing a detectable amount of cocaine base, a
Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and
(b)(1)(C).

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COUNT FORTY

(Distribution and Possession with Intent to Distribute Heroin and Fentanyl)

On or about June 29, 2021, in the District of New Jersey and elsewhere,
the defendant,

**ANGEL KEARNEY,
a/k/a “Jim,”
a/k/a “Dred,”**

did knowingly and intentionally distribute and possess with intent to distribute
a mixture and substance containing a detectable amount of heroin, a Schedule
I controlled substance, and fentanyl, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and
(b)(1)(C).

COUNT FORTY-ONE

(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

On or about June 29, 2021, in Essex County, in the District of New Jersey and elsewhere, the defendant,

**ANGEL KEARNEY,
a/k/a “Jim,”
a/k/a “Dred,”**

in furtherance of a drug trafficking crime for which the defendant may be prosecuted in a court of the United States, namely, distribution and possession with intent to distribute heroin and fentanyl charged in Count Forty of this Second Superseding Indictment, did knowingly possess a firearm—namely, a loaded 9mm G2S model handgun, bearing serial number TLS18910.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

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COUNT FORTY-TWO

(Possession of a Firearm and Ammunition by a Convicted Felon)

On or about June 29, 2021, in Essex County, in the District of New Jersey and elsewhere, the defendant,

**ANGEL KEARNEY,
a/k/a “Jim,”
a/k/a “Dred,”**

knowing that he had previously been convicted of at least one crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting interstate commerce a 9mm G2S model handgun, bearing serial number TLS18910, and six (6) rounds of 9mm ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

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COUNT FORTY-THREE

(Possession of a Firearm and Ammunition by a Convicted Felon)

On or about June 29, 2021, in Essex County, in the District of New Jersey and elsewhere, the defendant,

**KASIM THURSTON,
a/k/a “Kai,”
a/k/a “Kaz,”**

knowing that he had previously been convicted of at least one crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting interstate commerce a Springfield Hellcat 9mm handgun, bearing serial number BY344715, and ten rounds of 9mm ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

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COUNT FORTY-FOUR

(Distribution and Possession with Intent to Distribute Heroin and Fentanyl)

On or about June 29, 2021, in the District of New Jersey and elsewhere,
the defendant,

**THOMAS GIBSON,
a/k/a “Tommy,”**

did knowingly and intentionally distribute and possess with intent to distribute
a mixture and substance containing a detectable amount of heroin, a Schedule
I controlled substance, and fentanyl, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and
(b)(1)(C).

FORFEITURE ALLEGATION ONE

As a result of committing the firearms offenses in violation of 18 U.S.C. §§ 922(g)(1) and 924(c), as charged in Counts 22, 27, 28, 32, 33, 41, 42, and 43 of this Second Superseding Indictment, the defendants,

**KASIM THURSTON,
a/k/a “Kai,”
a/k/a “Kaz,”
JAMAR HALL,
a/k/a “Goo,”
JAKAI DENNIS,
a/k/a “Bop,” and
ANGEL KEARNEY,
a/k/a “Jim,”
a/k/a “Dred,”**

shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearms and ammunition involved in or used in the commission of such offenses, including, but not limited to:

- (1) nine rounds of .40 caliber ammunition;
- (2) one 9mm Taurus handgun, bearing serial number TC028853;
- (3) 17 rounds of 9mm ammunition;
- (4) one 9mm G2S model handgun, bearing serial number
TLS18910;
- (5) six rounds of 9mm ammunition;
- (6) one .45 caliber handgun, bearing serial number GI128413,
- (7) five rounds of .45 caliber ammunition;
- (8) one 9mm handgun, bearing serial number F12502;
- (9) 33 rounds of 9mm ammunition;

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- (10) one Springfield Hellcat 9mm handgun, bearing serial number BY344715; and
- (11) ten rounds of 9mm ammunition.

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FORFEITURE ALLEGATION TWO

As a result of committing the controlled substance offenses in violation of 21 U.S.C. § 846 and 21 U.S.C. §§ 841(a)(1) and (b)(1)(C), as charged in Counts 1 through 21, 23 through 26, 29 through 31, 34 through 40, and 44 of this Second Superseding Indictment, the defendants,

**JAKAI DENNIS,
a/k/a Bop,”
ANGEL KEARNEY,
a/k/a “Jim,”
a/k/a “Dred,”
THOMAS GIBSON,
a/k/a “Tommy,”
JAMAR HALL,
a/k/a “Goo,”
KEVIN HALL,
KASIM THURSTON,
a/k/a “KAI,”
a/k/a “KAZ,”
IBN THURSTON,
a/k/a “Wheezy,”
a/k/a “Saheed,”
SHALAMAR McCALL,
a/k/a “Shaggy,”
HAKIS MOSES,
a/k/a “Hak,” and
JALEEL DRAKE,
a/k/a “Lil,”
a/k/a “SK,”**

shall forfeit to the United States any and all property constituting or derived from any proceeds the defendants obtained directly or indirectly as a result of violating 21 U.S.C. § 846 or 21 U.S.C. §§ 841(a)(1) and (b)(1)(C), and any property used or intended to be used in any manner or part to commit and to facilitate the commission of the offenses alleged in Counts 1 through 21, 23 through 26, 29 through 31, 34 through 40, and 44 of this Second Superseding

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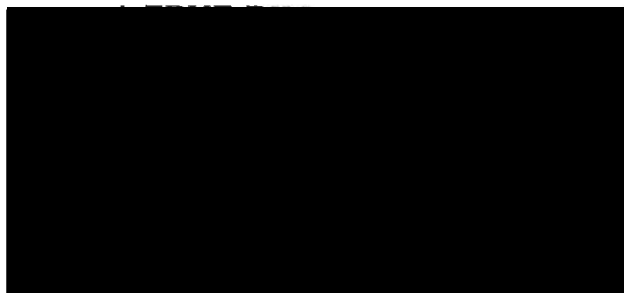
Indictment.

Substitute Assets Provision
(Applicable to all Forfeiture Provisions)

If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.



A handwritten signature in cursive script, reading "Philip R. Sellinger", written over a horizontal line.

PHILIP R. SELLINGER
United States Attorney

CASE NUMBER: 21-838 (BRM)

**United States District Court
District of New Jersey**

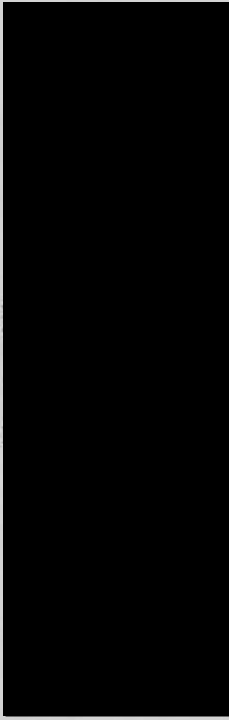
UNITED STATES OF AMERICA

v.

**JAKAI DENNIS,
a/k/a "Bop,"
ANGEL KEARNEY,
a/k/a "Jim,"
a/k/a "Dred,"
THOMAS GIBSON,
a/k/a "Tommy,"
JAMAR HALL,
a/k/a "Goo,"
KEVIN HALL,
KASIM THURSTON,
a/k/a "KAI,"
a/k/a "KAZ,"
IBN THURSTON,
a/k/a "Wheezy,"
a/k/a "Saheed,"
SHALAMAR McCALL,
a/k/a "Shaggy,"
HAKIS MOSES,
a/k/a "Hak," and
JALEEL DRAKE,
a/k/a "Lil,"
a/k/a "SK"**

SECOND SUPERSEDING INDICTMENT FOR

21 U.S.C. § 846
21 U.S.C. §§ 841(a)(1), (b)(1)(C)
18 U.S.C. § 922(g)(1)
18 U.S.C. § 924(c)(1)(A)(i)



PHILIP R. SELLINGER
UNITED STATES ATTORNEY
FOR THE DISTRICT OF NEW JERSEY

ROBERT FRAZER
ASSISTANT U.S. ATTORNEY
NEWARK, NJ
973-297-2897
